IN THE UNITED STATES DISTRICT COURT DISTRICT OF SOUTH CAROLINA CHARLESTON DIVISION

Michael Slager,)
) Case No. 2:15-cv-04536-DCN
	Plaintiff,	
vs.) MOTION FOR SUMMARY JUDGMENT
Southern States Police Benev Association, Inc.,	olent)))
	Defendant.)))

The Defendant Southern States Police Benevolent Association, Inc., hereby moves for summary judgment in this matter. This motion relies upon the following grounds:

- A. Mr. Slager's shooting an unarmed Mr. Scott five times in the back as he fled, planting the Taser beside Mr. Scott's body, and lying to the PBA and SLED are intentional acts outside the scope of Mr. Slager's duty as a police officer;
- B. Mr. Slager has produced no evidence of damages to support his claims;
- C. Mr. Slager has refused to answer relevant questions about his claims asserting his privilege against self-incrimination; and
- D. South Carolina does not recognize a civil cause of action based on Code Section 38-59-20 regarding unfair claims practices.

MOORE TAYLOR LAW FIRM, P.A.

By: s/James Edward Bradley _

James Edward Bradley, Fed. I.D. No. 6330 S. Jahue Moore, Fed. I.D. No. 3120 Donna Givens, Fed. I.D. No. 5411 MOORE TAYLOR LAW FIRM, P.A. 1700 Sunset Boulevard (29169) P.O. Box 5709 West Columbia, SC 29171 (803) 796-9160 Attorneys for Defendant

West Columbia, South Carolina July 14, 2016